

UNITED STATES DISTRICT COURT
DISTRICT OF RHODE ISLAND

CITIMORTGAGE, INC.

VS

CA NO. 19-CV-604-MSM-LDA

PAUL O. BOGHOSSIAN, III et al

MOTION TO EXTEND TIME

Defendants, by their attorney, move this Court for an extension of time to October 6, 2020 to respond to the Interrogatories and Request for Production propounded by the Plaintiff on July 13, 2020. The Plaintiff had agreed to an extension of time to September 29, 2020. However due to the closure of the Jamestown Town Hall for visits and the extent of the discovery propounded, they need a brief extension of time to fully respond. The Plaintiff was requested but was unable to comply with this brief extension. In order not to prejudice the Plaintiff, the Defendants also move that the Scheduling Order be extended by 60 days for all dates in the current Scheduling Order for the parties.

This case involves more than a Judicial Foreclosure as it also involves a third party who is not the owner of the property and involves a strip of land, not included in this mortgage. Records at the Town of Jamestown are not readily accessible due to the pandemic and is a basis for the providing of the discovery relating to zoning matters at the Town of Jamestown in 2005.

For these reasons the Defendants move that this Court extend the time to respond to the Plaintiff's Discovery to October 6, 2020 and to amend the Scheduling Order to increase all deadlines by sixty days.

PAUL O. BOGHOSSIAN, III
DAVID M. BOGHOSSIAN
DAVID M. BOGHOSSIAN AS TRUSTEE OF
THE ALEXANDER CHANDLER BOGHOSSIAN TRUST
DAVID M. BOGHOSSIAN AS TRUSTEE
OF THE ELIZABETH ARDEN BOGHOSSIAN TRUST
JENNIFER BOGHOSSIAN

By their Attorney,

September 29, 2020

/s/ John B. Ennis
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CERTIFICATE OF SERVICE

I hereby certify that I emailed a copy of this Motion to Krystle Tadesse, Joseph Farside and Jeffrey Ankrom on September 29, 2020.

/s/ John B. Ennis